

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ORANGEBURG DIVISION**

Dawn Barnes,

Plaintiff,

v.

South Carolina State University,

Defendant.

C/A No. 5:23-cv-4449-SAL

**PLAINTIFFS ANSWERS TO LOCAL  
CIVIL RULE 26.01 (D.S.C.)  
INTERROGATORIES**

Plaintiff hereby answers the Court-ordered Local Civil Rule 26.01 (D.S.C.) Interrogatories as follows:

**(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

None are known to the Plaintiff.

**(B) As to each claim, state whether it should be tried jury or non-jury and why.**

Plaintiff is entitled to have her claims tried by a jury because this right is provided by statute or common law.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

Plaintiff is an individual.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

Venue is proper in in this division because the events giving rise to Plaintiffs claim were committed in this judicial district and division.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

This action is not related to any other matter filed in this District.

**(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

Not relevant to Plaintiff.

**(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting the claim against**

**you in this matter, identify such person or entity and describe the basis of said liability.**

Not relevant to Plaintiff.

**(H) In an action in which jurisdiction is based on diversity under 28 U.S.C § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship – of every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that court affect the court’s jurisdiction under §1332(a).**

Not applicable.

Respectfully submitted,

s/Samantha Albrecht

Samantha Albrecht (Bar No.: 102642)  
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**ATTORNEY FOR PLAINTIFF’S**

September 11, 2023  
Columbia, South Carolina